



## Wisconsin Healthcare Leaders Support Changes to DHS 144 - Immunization of Students

March 3, 2020

Assembly Committee on Constitution and Ethics

Chair Chuck Wichgers  
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 Rep. Marisabel Cabrera  
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 Rep. Gae Magnafici  
 Rep. Timothy Neylon  
 Rep. Timothy Ramthun  
 Rep. Jeremy Thiesfeldt

Honorable Chair Wichgers:

The undersigned coalition includes key physician organizations, health systems, hospitals, academic centers and other parties with a vested interest in the health and well-being of Wisconsin's children and families.

We strongly support the Wisconsin Department of Health Services' (DHS) proposed updates to the student immunization regulations in DHS 144, as they are necessary to bring those regulations into alignment with current recommendations put forward by the Centers for Disease Control and Prevention (CDC), the Advisory Committee on Immunization Practices (ACIP), the American Academy of Pediatrics (AAP) and current evidence-based practices. Further, the proposed changes streamline existing regulations and reporting requirements between state entities and include necessary clerical updates.

Immunization is a safe, life-saving way to prevent the spread of disease and keep children healthy as they grow. Each year in the US, vaccines save approximately 33,000 lives, prevent 14 million cases of disease, and save \$9.9 billion in direct care costs.<sup>1</sup> Vaccines keep communities healthy, and protect some of the most vulnerable in our society, including the elderly, and children who are too young to be vaccinated or have compromised immune systems. This is known as herd immunity or community protection. Children who do not receive immunizations when they are eligible to do so put kids who can't be vaccinated because of medical issues that include autoimmune diseases and cancer at great risk. Children fighting a difficult diagnosis simply should not have to worry about being exposed to a disease that is easily preventable through vaccination.

<sup>1</sup> <https://www.healthypeople.gov/2020/topics-objectives/topic/immunization-and-infectious-diseases>

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There is robust evidence that each of these universally recommended vaccines is both safe and effective. Timely immunization with all of the scheduled vaccines is important to protect every child against serious, potentially disabling, sometimes life-threatening infectious diseases like pertussis, meningitis and measles.

Unfortunately, the percentage of Wisconsin students who met minimum immunization requirements in the 2018-2019 school year was only 91.9%, down from 92.3% the previous year. We know that school settings are of particular concern for outbreaks of infectious disease. Every child across our entire state deserves to be protected against preventable diseases in a timely and equitable fashion.

It is our collective responsibility to provide the healthiest possible learning environment for all students. As such, we urge you to support the proposed rule updates as brought forth in DHS 144.

Sincerely,

Advocate Aurora Healthcare  
Ascension Wisconsin  
Children's Health Alliance of Wisconsin  
Children's Wisconsin  
Gundersen Health System  
Kids Forward  
Medical College of Wisconsin  
Pharmacy Society of Wisconsin  
Rural Wisconsin Health Cooperative  
Sixteenth Street Community Health Center  
Southern Wisconsin Immunization Consortium  
UW School of Medicine and Public Health  
UW Health  
UW Health American Family Children's Hospital  
Wisconsin Academy of Family Physicians  
Wisconsin Chapter of the American Academy of Pediatrics  
Wisconsin Medical Society

<sup>2</sup> <https://www.dhs.wisconsin.gov/publications.p01894.pdf>